

W-15-15(7/82)

9

(11)

RCRA INSPECTION FORM

HWM'S  
LISTING

AS  
OBSERVED

Report Prepared for:

Generator ☒

Transporter ☐

HWM (FSD) facility ☐

Copy of report sent to the facility ☐

Facility Information

Name: CONAR CO.

Address: 1405 BUFFALO ST.  
CHEEN

EPA ID#: N417 096 297 544

Date of Inspection: JUNE 30, 1983

Participating Personnel

State or EPA Personnel: A.D.M. KENZIE

Facility Personnel: LOU MARINO

✓ MICHAEL WARE, ENVIRONMENTAL COOR.  
✓ FRED BRISTOL, GEN'L. MGR.

Report Prepared by Name: A.D.M. KENZIE

Agency: N.Y.S.D.E.C.

Telephone #: (716) 847-4585

Approved for the Director by: \_\_\_\_\_

RECEIVED

JUL 22 1983

BUREAU OF  
HAZARDOUS WASTE OPERATIONS  
DIVISION OF SOLID WASTE

AUG 1 2 52 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

Summary of Findings

Facility Description and Operations

Crap is a manufacturer of epoxies & urethane resins. (15%)  
(85%)

The epoxies made here are mixed & blended from purchased ingredients - no temperature, pressure or chemical reactions are involved.

Urethanes are a conglomerate family of polymers formed by reaction of hydroxyl and isocyanate groups. Main ingredients are isocyanates & polyether polyols. The process takes place in bottles where the product is heated under pressure, mixed & cooled. Following processing solvents are circulated through the system & collected as a hazardous waste.

MEK is recovered in an on site still. MEK still bottoms & all waste halogenated solvent are sent off site for disposal.

-B- (1)

Describe the activities that result in the generation of hazardous waste.

Process residues of epoxies + methanes in mixing equipment + kettles must be cleaned after each batch. The contaminated solvents become hazardous wastes.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

haz. waste no.	date	gen. rate	MT.	description
	6/3/83	drum	MT.	
	(55 gal. drum)	(55 gal.)	MT.	
D001	0	15	0.25	ignitable (isopropenol)
				spent halogenated solvents used
F001	6	50	0.83	in degreasing (methylene chloride + 1,1,1 trichloroethane)
F005	18 <sup>③</sup> 3 <sup>④</sup>	50 <sup>②</sup>	0.83	spent non-halogenated solvents (HEX)

① This is probably not a RCRA waste. The material is used in a government contract & must be disposed of when it still meets generally accepted specifications for virgin material. It is sold to another company for use without processing.

-2-(7)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

② before on site distillation

③ unmixed MEK

④ MEK with some other non halogenated solvents

Is there reason to believe that the facility has hazardous waste on-site? *yes*

a. If yes, what leads you to believe it is hazardous waste?

Check appropriate boxes:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

no      note 7

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards

	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	___	___	___
263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long?	___	___	___
___ 10 days or less			
___ more than 10 days (complete TSD form)			
263.20 - <u>Manifest System</u>			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	___	___	___
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	___	___	___
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	___	___	___
o Transporter's name, EPA I.D. number, signature and date of signature	___	___	___
o TSDF's name, address and EPA I.D. Number	___	___	___
and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.	___	___	___
o Manifest Document number	___	___	___
o Proper DOT shipping description	___	___	___
o Quantity & type of containers	___	___	___
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	___	___	___
262.22 - Have records been kept since November 19, 1980?	___	___	___
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	___	___	___
If yes, was the incident report submitted to DOT? (obtain copy of the report)	___	___	___
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	___	___	___

General Comments:

All hazardous wastes are transported by SCA & shipped to the SCA site for disposal.

*This site is not a hazardous waste management facility - ship to*

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST  
(Facilities Subject to 40 CFR 265 Standards)

YES NO N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

- 1) Is there a detailed chemical and physical analysis of a representative sample of the waste or each waste?  
(At a minimum this analysis must contain all the information necessary for proper management of the waste) \_\_\_\_\_
- 2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?  
You may check only one

Waste characteristics vary \_\_\_\_\_  
All waste are basically the same \_\_\_\_\_  
Company treats all waste as hazardous \_\_\_\_\_

- 3) Is there a written waste analysis plan at the facility? \_\_\_\_\_

Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters. \_\_\_\_\_
- b) Test methods used to test these parameters. \_\_\_\_\_
- c) Sampling methods to obtain a representative sample of the waste to be analyzed. \_\_\_\_\_
- d) Frequency of repeated analysis to ensure accurate and current information. \_\_\_\_\_

- 4) Does hazardous waste come to this facility from an outside source? e.g. another generator. \_\_\_\_\_

- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest? \_\_\_\_\_

265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,  
b) a suitable barrier which completely surrounds the active portion of this facility? \_\_\_\_\_

- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility? \_\_\_\_\_

If no, explain what measures are taken for security.

265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule? \_\_\_\_\_
- 2) Does the schedule identify the types of problems to be looked for and the frequency of inspections? \_\_\_\_\_
- 3) Does the owner/operator record inspections in a log? \_\_\_\_\_
- 4) Is there evidence that problems reported in the inspection log have been remedied? \_\_\_\_\_

If no, please explain.

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

262.11 - Hazardous waste determination

- 1) Did the generator test its waste to determine whether it is hazardous?

Is the waste hazardous?

- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		None analyzed based on known data material
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

10

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		
		<input checked="" type="checkbox"/>



YES NO N/A  
1

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) ☒ ☐ ☐
- 2) Label each package according to DOT (i.e., 49 CFR 172) ☒ ☐ ☐
- 3) Mark each package according to DOT (i.e., 49 CFR 172) ☒ ☐ ☐
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) ☒ ☐ ☐

262.34 Accumulation Time

1) How is waste accumulated on-site?

- ☐ Containers
- ☐ Tanks
- ☐ Surface Impoundments (complete BWMF checklist)
- ☐ Piles (complete BWMF checklist)

2) Is waste accumulated for more than 90 days? ☒ ☐ ☐

If yes, complete BWMF checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? ☒ ☐ ☐

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements? ☒ ☐ ☐

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

YES NO N/A

40 CFR 265 - Subpart I Containers

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).

*55 gal. drums*

~~265.171~~ - Do the containers appear to be in good condition, not in danger of leaking?

*If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.*

265.172 - Are hazardous waste stored in containers made of compatible materials?

*If not, please explain.*

265.173(a) - Are all containers closed except those in use?

~~265.173(b)~~ - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

265.174 - Is the storage area inspected at least weekly?

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?

265.177 - Are incompatible wastes stored separate from each other?

*6 drums*  
*in storage*

*121 6 drums*  
*misc. 121 (100-110) 12 (all 121)*  
*misc. 121*  
*3*

NO

YES NO N/A

40 CFR 265 Subpart J - Tanks

265.190 1) What are the approximate number and size of tanks containing hazardous waste?

\_\_\_\_

2) Identify the waste treated/stored in each tank.

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

\_\_\_\_

If no, please explain.

2) Are there leaking tanks?

\_\_\_\_

3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

\_\_\_\_

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

\_\_\_\_

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

\_\_\_\_

265.194 - Inspections

1) Is the tank(s) inspected each operating day for

a) discharge control equipment

\_\_\_\_

b) monitoring equipment

\_\_\_\_

c) level of waste in tank

\_\_\_\_

2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

\_\_\_\_

3) Are there underground tanks?

\_\_\_\_

If yes, how many and can they be entered for inspection?

\_\_\_\_

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

\_\_\_\_

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?

\_\_\_\_

YES NO N/A

265.16 - Personnel Training

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed? ☒ ☐ ☐
- If yes, have facility personnel taken part in an annual review of training? ☒ ☐ ☐
- 2) Is there written documentation of the following:
  - job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ☐ ☒ ☐
  - type and amount of training to be given to personnel in jobs related to hazardous waste management? ☐ ☒ ☐
  - actual training or experience received by personnel? ☐ ☒ ☐
- 3) Are training records kept on all employees for at least 3 years? ☒ ☐ ☐

40 CFR 265 - Subpart C - Preparedness and Prevention

- 265.32 Does the facility comply with preparedness and prevention requirements including maintaining:
- an internal communications or alarm system? ☒ ☐ ☐
  - a telephone or other device to summon emergency assistance from local authorities? ☒ ☐ ☐
  - portable fire equipment? ☒ ☐ ☐
  - water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc. ☒ ☐ ☐
- 265.33 Is equipment tested and maintained? ☒ ☐ ☐
- 265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste? ☒ ☐ ☐
- 265.35 Adequate aisle space? ☒ ☐ ☐
- If no, please explain storage pattern.
- In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain. ☒ ☐ ☐

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

- Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste? ☒ ☐ ☐
- 1) Does the plan describe arrangements made with the local authorities? ☒ ☐ ☐
  - 2) Has the contingency plan been submitted to the local authorities? ☒ ☐ ☐
  - 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators? ☒ ☐ ☐
  - 4) Does the plan have a list of what emergency equipment is available? ☒ ☐ ☐
  - 5) Is there a provision for evacuating facility personnel? ☒ ☐ ☐
  - 6) Was there an emergency coordinator present or on call at the time of the inspection? ☒ ☐ ☐